IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

WILLIAM A. PIGG, PLLC,	§
	§
Plaintiff and Counterdefendant	§
	§
v.	§
	§
JEFF Z. XIE,	§
	§
Defendant and Counterplaintiff	§
	§
WIE LAW OFFICES LLS	§ Civil Action No. 3:21-cv-01587-C
XIE LAW OFFICES, LLC,	8
GEORGIA REGOINAL CENTER, LLC,	§
and JEFF Z. XIE,	§ .
Third Douter Dlointiffe	§
Third-Party Plaintiffs	§ 2
***	§ 2
v.	§ 8
WILLIAM A. PIGG, PLLC and	§ §
WILLIAM A. PIGG,	
WILLIAM A. I 100,	§ §
	§
Third-Party Defendants.	§
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COUNTERPLAINTIFF AND THIRD-PARTY PLAINTIFFS' MOTION TO EXPEDITE

Counterplaintiff/Third-Party Plaintiff Jeff Xie ("Xie") and Third-Party Plaintiffs Xie Law Offices, LLC and Georgia Regional Center, LLC (collectively "the Xie Parties") file this motion to expedite and request the Court to order an expedited response to the Xie Parties' motion for reconsideration of the Court's decision that it lacks jurisdiction to reconsider its decision to not award attorney fees and would respectfully show the Court the following:

1. In its August 17, 2021 Order granting the Xie Parties' amended motion to remand, the Court declined to award attorney fees to the Xie Parties and against Pigg PLLC and Pigg. (ECF

No. 16). In its October 12, 2021 Order, the Court declined to address the Xie Parties' motion for partial reconsideration, stating that the Court lacked jurisdiction. (ECF No. 21).

- 2. In their motion for reconsideration of the Court's decision that it lacks jurisdiction to reconsider its decision to not award attorney fees, the Xie Parties have asked the Court to reconsider its jurisdiction decision. (ECF No. 22).
- 3. Based on the authorities cited in their motion for reconsideration of the Court's decision that it lacks jurisdiction, the Xie Parties contend that it is indisputable that the Court has jurisdiction to address the attorney-fee issue on reconsideration and that waiting for a response is unnecessary. But should the Court desire a response, the Xie Parties respectfully request that that Court order the filing of an expedited response on or before October 27, 2021.
- 4. The Xie Parties seek an expedited response and ruling to avoid their having to appeal the jurisdiction and attorney-fee issues without the Court having had an opportunity to reconsider its two rulings that are the subjects of the two motions for reconsideration.

Prayer

For the above reasons, the Xie Parties ask that, unless the Court grants the Xie Parties' motion for reconsideration of the Court's decision that it lacks jurisdiction to reconsider its decision to not award attorney fees without having received a response, the Court order an expedited response to the motion by October 27, 2021.

Respectfully submitted,

CURNUTT & HAFER, L.L.P.

By:/s/Stephen W. Kotara
Stephen W. Kotara

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ATTORNEY FOR JEFF Z. XIE, XIE LAW OFFICES, LLC, AND GEORGIA REGIONAL CENTER, LLC

CERTIFICATE OF CONFERENCE

I certify that I conferred with opposing counsel Charles L. Woods about the underlying motion, and because Mr. Woods opposes this motion, it is presumed that he opposes this motion.

/s/ Stephen W. Kotara
Stephen W. Kotara

CERTIFICATE OF SERVICE

I certify that this instrument was delivered by electronic service to the following parties and counsel of record on October 20, 2021:

Charles L. Woods William A. Pigg, PLLC 10455 North Central Expressway, Suite 109 Dallas, Texas 75231 ATTORNEY FOR WILLIAM A. PIGG, PLLC AND WILLIAM A. PIGG

/s/ Stephen W. Kotara

Stephen W. Kotara